

EXHIBIT # 4

From: Tyrone Blackburn tblackburn@tablackburnlaw.com
Subject: Re: dismissing SAC
Date: May 13, 2024 at 2:08 PM
To: Donald S. Zakarin DZakarin@pryorcashman.com
Cc: James A. Janowitz JJanowitz@pryorcashman.com, William Charron WCharron@pryorcashman.com

See attached,

I will file as soon as I return home. It should be around 6 pm EST.



Declaration for
Dismissal.pdf

**UNITED STATES FEDERAL COURT
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

Plaintiff,

v.

SEAN COMBS,
JUSTIN DIOR COMBS
CUBA GOODING JR.,
LUCIAN CHARLES GRAINGE,
KRISTINA KHORRAM,
LOVE RECORDS,
MOTOWN RECORDS,
UNIVERSAL MUSIC GROUP,
COMBS GLOBAL ENTERPRISES,
JOHN and JANE DOES 1-10 and
ABC CORPORATIONS. 1-10

Defendants.

Case Number: 24-1457

**Notice Of Motion For Dismissal Of All
Claims and Allegations Against Lucian
Charles Grainge, Motown Records and UMG
Recordings, Inc. (Incorrectly named as
Universal Music Group)**

PLEASE TAKE NOTICE that, upon the supporting Declaration of Tyrone A. Blackburn dated May 13, 2024, and all prior proceedings heretofore had and all papers filed herein, Plaintiff Rodney Jones will move this Court, at a date and time to be determined by the Court, for an Order, pursuant to Rules 15, 21 and 41 of the Federal Rules of Civil Procedure, dismissing all claims and striking all allegations made against Lucian Charles Grainge, Motown Records, UMG Recordings, Inc. (incorrectly named as Universal Music Group) in the Second Amended Complaint with prejudice and removing Lucian Charles Grainge, Motown Records, UMG Recordings, Inc. (incorrectly named as Universal Music Group) from the caption of this action.

T. A. BLACKBURN LAW, PLLC.

By:

Tyrone A. Blackburn, Esq.
Attorney for Plaintiff

Tyrone A. Blackburn, Esq.
T. A. Blackburn Law, PLLC.
Phone: 347-342-7432
TABlackburnlaw.com

On May 13, 2024, at 2:01 PM, Zakarin, Donald S. <DZakarin@pryorcashman.com> wrote:

I have a slight change, which I think does not change any substance. All of our correspondence is encompassed in our motions and I think we should have a clean record.

If this works, send me final and you should file today and we can respond today.

Donald S. Zakarin
Pryor Cashman, LLP
7 Times Square
New York, NY 10036
212-326-0108 (P)
212-798-6306 (F)
347-820-0793 (C)
dzakarin@pryorcashman.com

-----Original Message-----

From: Tyrone Blackburn <tblackburn@tablackburnlaw.com>
Sent: Monday, May 13, 2024 1:20 PM
To: Zakarin, Donald S. <DZakarin@pryorcashman.com>
Cc: Janowitz, James A. <JJJanowitz@pryorcashman.com>; Charron, William <WCharron@pryorcashman.com>
Subject: Re: dismissing SAC

I made a slight edit to the declaration. I highlighted the changes. See attached. I accept the changes you made to the notice of dismissal.

Regards,

Tyrone A. Blackburn, Esq.
T. A. Blackburn Law, PLLC.
Phone: 347-342-7432
TABlackburnlaw.com

CONFIDENTIALITY NOTICE

This email contains confidential information which may also be legally privileged and which is intended only for the use of the recipient(s) named above. If you are not the intended recipient, you are hereby notified that forwarding or copying of this email, or the taking of any action in reliance on its contents, may be strictly prohibited. If you have received this email in error, please notify us immediately by reply email and delete this message from your inbox.
<declaration for dismissal-TB Edit.docx>

**UNITED STATES FEDERAL COURT
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

Plaintiff,

v.

SEAN COMBS,
JUSTIN DIOR COMBS
CUBA GOODING JR.,
LUCIAN CHARLES GRAINGE,
KRISTINA KHORRAM,
LOVE RECORDS,
MOTOWN RECORDS,
UNIVERSAL MUSIC GROUP,
COMBS GLOBAL ENTERPRISES,
JOHN and JANE DOES 1-10 and
ABC CORPORATIONS. 1-10

Defendants.

Case Number: 24-1457

**Declaration of Tyrone A. Blackburn In
Support of Plaintiff's Motion For Dismissal
Of All Claims and Allegations Against Lucian
Charles Grainge, Motown Records and UMG
Recordings, Inc. (Incorrectly named as
Universal Music Group**

I, Tyrone A. Blackburn, declare as follows:

1. I am the principal of Tyrone A. Blackburn Law, PLLC. I am counsel in this case for the Plaintiff, Rodney Jones. I have personal knowledge of the facts set forth in this Declaration and if called and sworn as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of the Plaintiff's motion, pursuant to Rules 15, 21 and 41 of the Federal Rules of Civil Procedure, for the dismissal with prejudice of all claims made in the Second Amended Complaint against Lucian Charles Grainge, Motown Records and Universal Music Group (which I am advised was incorrectly named in the Second Amended Complaint and is properly named as UMG Recordings, Inc.), to amend the Second Amended Complaint solely to the extent of deleting therefrom all references to and allegations made against

Mr. Grainge, Motown Records and Universal Music Group/UMG Recordings, Inc. (collectively the “UMG Defendants”) and amending the caption to remove them therefrom.

3. The UMG Defendants have made two motions to dismiss, first directed against the First Amended Complaint and then against the Second Amended Complaint. Based on my examination of all of the papers submitted in support of both motions to dismiss, which addressed the issues I had, I have concluded that there is no legal or factual basis for the claims and allegations that were made against the UMG Defendants. As such, I have determined that the proper course of action is for all of the claims and all of the allegations to be withdrawn immediately and the Second Amended Complaint as against the UMG Defendants be dismissed with prejudice. And to accomplish the striking of all references to the UMG Defendants in the Second Amended Complaint, I respectfully request that the Second Amended Complaint be deemed amended to delete therefrom any and all references to the UMG Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated May 13, 2024

Tyrone A. Blackburn

**UNITED STATES FEDERAL COURT
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

Plaintiff,

v.

SEAN COMBS,
JUSTIN DIOR COMBS
CUBA GOODING JR.,
LUCIAN CHARLES GRAINGE,
KRISTINA KHORRAM,
LOVE RECORDS,
MOTOWN RECORDS,
UNIVERSAL MUSIC GROUP,
COMBS GLOBAL ENTERPRISES,
JOHN and JANE DOES 1-10 and
ABC CORPORATIONS. 1-10

Defendants.

Case Number: 24-1457

**Notice Of Motion For Dismissal Of All
Claims and Allegations Against Lucian
Charles Grainge, Motown Records and UMG
Recordings, Inc. (Incorrectly named as
Universal Music Group)**

PLEASE TAKE NOTICE that, upon the supporting Declaration of Tyrone A. Blackburn dated May 13, 2024, and all prior proceedings heretofore had and all papers filed herein, Plaintiff Rodney Jones will move this Court, at a date and time to be determined by the Court, for an Order, pursuant to Rules 15, 21 and 41 of the Federal Rules of Civil Procedure, dismissing all claims and striking all allegations made against Lucian Charles Grainge, Motown Records, UMG Recordings, Inc. (incorrectly named as Universal Music Group) in the Second Amended Complaint with prejudice and removing Lucian Charles Grainge, Motown Records, UMG Recordings, Inc. (incorrectly named as Universal Music Group) from the caption of this action.

T. A. BLACKBURN LAW, PLLC.

By:

Tyrone A. Blackburn, Esq.
Attorney for Plaintiff